

September 27, 2004

Tracie Billington
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-001

Subject: Comments on the Proposition 50 – Integrated Regional Water Management
Grant Program Draft Guidelines

Dear Ms. Billington:

On behalf of the California Bay-Delta Public Advisory Committee's Drinking Water Subcommittee (DWS), we submit the following comments on the Department of Water Resources (DWR) and State Water Resources Control Board (SWRCB) Draft Guidelines for the Proposition 50 Integrated Regional Water Management Grant Program (IRWMP Grant Guidelines). DWR and the SWRCB are both original signatories to the Memorandum of Understanding for implementation of the CALFED Bay-Delta Program's Drinking Water Quality Program (DWQP).

The target of the CALFED Drinking Water Quality Program, described in the August 28, 2000 Record of Decision, is to achieve either achieve either: (a) average concentrations at Clifton Court Forebay and other southern and central Delta drinking water intakes of 50 µg/L bromide and 3.0 mg/L total organic carbon, or (b) an equivalent level of public health protection. Over the past two and a half years, the DWS has worked to outline what is meant by an equivalent level of public health protection (ELPH) and how to achieve it. At the core of this strategy is the development of Regional ELPH Plans, in which local agencies work at a regional level to determine the suite of local, regional, and state and federal actions needed to achieve an equivalent level of public health protection. The ELPH also recognizes that water quality objectives in source waters and water quality regulations protecting consumers are dynamic and best met with flexible plans that look at all points in a drinking water system, from source to tap.

The CALFED Drinking Water Quality Program was not specifically identified as a funding recipient in Chapter 7 of Proposition 50, in spite of the intent of the proposition to support the CALFED Bay-Delta Program. Chapter 8 of Proposition 50 is intended to support a number of drinking water quality goals, as outlined in the draft criteria (although not specifically recognizing the CALFED drinking water quality goals). Regional ELPH Plans should be part of all IRWMPs that include drinking water sources and link to the Delta, its tributaries, or its water delivery infrastructure, directly or indirectly. DWR and the SWRCB, as implementing agencies of the DWQP, should both give guidance to applicants on developing and including Regional ELPH Plans, and should consider how projects and regional plans fit together to implement the DWQP when awarding funding. Consideration should be given to project proposals that have considered how the project could integrate into a strategy to provide the equivalent level

of public health protection in the CALFED goal. Enclosed is a suggested attachment to the Chapter 8 criteria to clarify the purpose and structure of Regional ELPH Plans.

The DWS strongly encourages DWR and the SWRCB to work with the DWQP staff and the DWQP implementing agencies to develop more specific guidance on incorporating the Regional ELPH Planning concepts into this IRWMP guidance. It is critical to the success of the CALFED Drinking Water Quality Program.

Sincerely,

Greg Gartrell
Chair

Attachment

Attachment: Incorporating Regional ELPH Plans into Integrated Regional Water Management Plans

Integrated Regional Water Management Plans (IRWMPs) are integrated regional water management plans that include water quality as one of many components. The CALFED Drinking Water Quality Program and Drinking Water Subcommittee have developed a framework to define the CALFED Record of Decision's target of an "equivalent level of public health protection" (ELPH) as an alternative to achieving numeric bromide and total organic carbon in the Delta.

The ELPH strategy addresses water quality problems through a multiple barrier approach, utilizing every available tool – from the source water to the customer's tap. At the core of the ELPH strategy is the regional ELPH plan, the highest priority for the CALFED Drinking Water Quality Program and the Drinking Water Subcommittee. The regional ELPH plan – the water quality component of an IRWMP – describes a region's water quality issues (both existing and anticipated) and identifies, examines, and prioritizes actions that are needed to resolve those issues. It further categorizes these actions by the broadness of their benefits – state, regional, or local actions. The regional ELPH plans will coordinate with the CALFED Drinking Water Quality Program to help define the overall program to achieve the CALFED drinking water targets.

Further information on the ELPH strategy is available on CALFED's Drinking Water Quality Program website – including the ELPH diagram and the conceptual framework – and through Drinking Water Quality Program staff. CALFED does not anticipate that framing the water quality element of an IRWMP as a Regional ELPH Plan would involve significant effort, and would result in a significantly more uniform picture of water quality in California. Regional ELPH plans may also become a prerequisite for CALFED Drinking Water Quality funding.

For further information, please visit the website at <http://calwater.ca.gov/Programs/DrinkingWater/DrinkingWater.shtml>
Or contact Lisa Holm at 916-445-0782.